Remarks

The applicant has cancelled dependent claims 1, 6, 10, 11, and replaced them with new claims 12-15 which more clearly define the invention

The Applicant requests consideration of new claims 12-15 and dependent claims thereon.

In the Office Action, the Examiner rejected claims 1-11 under 35 U.S.C. 103(a) as being unpatentable over Haig Michael Zadikian et al. (U.S. Patent No. 6,631,134), and in view of Ernst A. Munter (U.S. P.G. Pub. No. 2002/0075540). In response, Applicant has replaced Independent claims 1, 6, 10 and 11 with new independent claims 12-15. Applicant submits that claims 12-15 are now patentable over Zadikian et al., in view of Munter for the reasons outlined below.

The present invention, as recited in new independent claims 12-15, and described in the application, defines a sub-grouping where a sub group is created for each slot on the network platform and consists of a distinct set of elements from at least one additional functional group and where each subgroup element shares at least one visual identifier. Specifically, the network platform recited in new claims 12-15 includes a plurality of slots for receiving power service modules and associated functional modules arranged in functional groups. Each slot, power service module and functional module of a functional group is provided with a respective visual identifier for slot module identification which consists of an alpha, numeric and colour identifiers. A subgroup is formed when a slot, power service module and functional module of the associated functional group each share at least one alpha identifier, numeric identifier and colour graphic identifier. By utilizing the said labeling scheme in a network platform, an advantage of the current invention is described in the specification at page 8, lines 4-8, which states "the overall layout and numbering scheme of the functional groups also facilitates quick and error free location of a particular component by a technician by presenting the labeling information in a manner which corresponds to text presented on the page of a book in the English language". Therefore, the visual identifiers used in the current invention aids in the identification of related functional entries of two or more functional groups in a networking system during service.

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Applicant respectfully submits that Munter does not disclose or teach a sub-grouping where a sub group is created for each slot on the network platform and consists of a distinct set of elements from at least one additional functional group where each subgroup element shares at least one visual identifier, nor does it teach the grouping of elements in a network platform. Nothing in Munter would lead one skilled in the art to such an arrangement. Instead, general descriptors of a scalable network architecture that allows both backbone nodes and network capacity to increase, is provided. Therefore, it is submitted that the claims on file are neither anticipated nor obvious in view of Munter et al.

Applicant respectfully submits that Zadikian et al. does not disclose or teach a sub-grouping where a sub group is created for each slot on the network platform and consists of a distinct set of elements from at least one additional functional group and where each subgroup element shares at least one visual identifier. In fact, Zadikian et al. teaches away from the claimed invention by limiting groups to a set of slots on a shelf where each group plays a role in bandwidth management. This is confirmed by Zadikian on FIG 4 and Col 13, lines 7-8, which states that "A group is made up of line cards occupying a number of slots on a shelf.". Applicant notes that this definition of group does not imply a sub group where each slot on the network platform consists of a distinct set of elements from at least one other functional group. Applicant further notes that the visual identifiers specified in the present invention to identify a subgroup of elements in a network platform were not disclosed nor taught in Zadikian et al.. Rather, the identifiers utilized in Zadikian et al. are limited to numeric labels. For example, In FIG 2, a group of line cards are represented with the label 221(N, 1)-(N,N) where the variable N is also a numeric identifier. Col 9 line 54-60 confirms this by defining 'N' as "the final element of a series of related or similar elements." As such, nothing in Zadikian et al. would lead one skilled in the art to a sub-grouping where a sub group is created for each slot on the network platform and consists of a distinct set of elements from at least one additional functional group and where each subgroup element shares at least one visual identifier. Therefore, it is submitted that the claims on file are neither anticipated nor obvious in view of Zadikian et al.

Applicant submits that none of Zadikian et al. or Munter, either alone or in combination, teach or suggest the invention recited in independent claims 12-15 or any claims that depend from them.

In response to the Examiner's objection to Claim 1, 6, 10-11, now replaced with new claims 12-15 and amended dependent claims stating that Munter taught fan functions for the purpose of providing for a wide range of network capacities coverage, according to specification Munter [0026-0036], New Claims 12-15 and dependent claims thereon and should be allowable for the reasons stated above. Moreover, the fan functions described in [0026-0036] is in reference to system fan-out capabilities and is not relevant to the fan equipment numbering schemes detailed in the present invention.

In response to the Examiner's objection to Claim 4 and 9, stating that Munter taught colour identifiers for the purpose of providing for a wide range of network capacities coverage, according to specification Munter [0079-0081], Applicant respectfully disagrees because each of these claims adds further limitations for independent Claims 12-15 should be allowable for the reasons stated above. Moreover, the colour identifiers described in Munter [0079-0081] is in reference to wavelength colours and how they can be used for scaling network capacity and is not relevant to the colour-coding labeling scheme detailed in the present invention.

In response to the Examiner's objection to claim 3, and 8 stating that Zadikian teaches a functional group that is provided with a label associated with it, Applicant respectfully disagrees because the said claim adds further limitations for independent Claims 12-15 and should be allowable for the reasons stated above.

In response to the Examiner's objection to claim 2 and 7 stating that Zadikian teaches an alpha identifier, a numeric identifier or a color identifier, Applicant respectfully disagrees because the said claim adds further limitations for independent claims 12-15 and should be allowable for the reasons stated above.

As all the cited references fail to disclose a sub-grouping where a sub group is created for each slot on the network platform and consists of a distinct set of elements from at least one additional functional group and where each subgroup element shares at least one visual identifier, it is apparent that, even should the motivation to combine them exist, the resulting combination would not provide all the present claim limitations. Applicant therefore requests consideration of new claims 12-15 and dependent claims and withdrawal of the rejections under 35 U.S.C. 103(a).

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In view of the above amendments and discussion, the Applicants request early allowance of the amended application.

No fee is believed due for this submission. However, Applicant authorizes the Commissioner to debit any required fee from Deposit account 14-1315. The Commissioner is further authorized to debit any additional amount required, and to credit any overpayment to the above-noted deposit account.

Yours very truly,

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